IN THE SUPERIOR COURT OF DEKALB COUNTY STATE OF GEORGIA JAB

TOMMIE F. WEDLOWE,
Plaintiff,

*

vs. * Civil Action No. 22CV10700

*

SENTRY SELECT INSURANCE COMPANY, FAST LANE CARRIERS, LLC., and NIJAZ IBRISEVIC, Defendants.

DEFENDANTS' FIRST REQUESTS FOR ADMISSIONS TO PLAINTIFF

COME NOW Defendants, and pursuant to O.C.G.A. § 9-11-36 et. seq., request that Plaintiff admit the following for purposes of this action only, within thirty (30) days.

1.

The amount in controversy, exclusive of interest and costs, in this matter exceeds \$75,000.00.

2.

Plaintiff seeks to recover special damages in this case in an amount greater than or equal to \$75,000.00.

3.

Plaintiff seeks to recover general damages in this case in an amount greater than or equal to \$75,000.00.

4.

The damages and recovery sought by the Plaintiff in the within action, exclusive of interest and cost, exceeds \$75,000.00.

5.

The damages and recovery sought by the Plaintiff in the within action, exclusive of interest and cost, does **not** exceed \$75,000.00.

6.

The total damages of the Plaintiff proximately caused by the incident complained of in the within action does **not** exceed \$75,000.00.

This 12th day of January, 2023.

FAIN MAJOR & BRENNAN, P.C.

One Premier Plaza 5605 Glenridge Dr. N.E., Suite 900 Atlanta, GA 30342-1445 (404) 688-6633

jhardee@fainmajor.com dray@fainmajor.com

/s/ James W. Hardee

JAMES W. HARDEE Georgia Bar No. 324399 DALE C. RAY, JR. Georgia Bar No. 596095 Counsel for Defendants

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SENTRY SELECT INSURANCE
COMPANY, FAST LANE CARRIERS,
LLC., and NIJAZ IBRISEVIC,
Defendants.
*

CERTIFICATE OF SERVICE

This is to certify that I have this date served upon counsel for the opposing parties in the foregoing matter a copy of the **Defendants' First Request for Admissions to Plaintiff** electronically via Odyssey eFileGA, via statutory electronic service, or by placing same in the United States Mail, postage prepaid, addressed as follows:

Joe Morris, III
N. John Bey
BEY & ASSOCIATES, LLC
191 Peachtree St. NE, Suite 3200
Atlanta, GA 30303
john@beyandassociates.com
joe@beyandassociates.com

This 12th day of January, 2023.

FAIN MAJOR & BRENNAN, P.C.

/s/ James W. Hardee

One Premier Plaza 5605 Glenridge Dr. N.E., Suite 900 Atlanta, GA 30342-1445 (404) 688-6633 <u>jhardee@fainmajor.com</u> dray@fainmajor.com JAMES W. HARDEE Georgia Bar No. 324399 DALE C. RAY, JR. Georgia Bar No. 596095 Counsel for Defendants